

January 29, 2025

BY ECF

The Honorable Ronnie Abrams
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Doe v. Combs, et. al.*, Case No. 24-cv-07973 (RA)

Dear Judge Abrams:

We write jointly on behalf of the Plaintiff in this action and defendants Sean Combs, Daddy's House Recordings Inc., CEOpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (the "Combs Defendants") and defendant Bad Boy Records, LLC.

The undersigned parties respectfully request that the Court's previously ordered deadline to submit a pre-conference joint letter and case management plan, currently scheduled for January 31, 2025, and initial pretrial conference, currently scheduled for February 7, 2025, be adjourned pending resolution of Defendants' anticipated motions to dismiss. *See* ECF #20. Per the stipulated deadline approved in the Court's prior order (ECF #39), Defendants intend to file motions to dismiss the Complaint on or before March 11, 2025.

All parties believe that it will be more efficient to defer discovery pending resolution of the anticipated motions to dismiss. If these motions are successful, they may result in complete dismissal of this action in its entirety or against certain defendants, which could significantly alter the scope of discovery that needs to be conducted.

Discovery in this matter is further complicated by the impending criminal trial of Defendant Sean Combs, which is scheduled to begin before Judge Subramanian on May 5, 2025. *See USA v. Combs*, Case No. 24-cr-00542 (S.D.N.Y.). The parties agree that it is impractical to proceed with various aspects of fact discovery involving Mr. Combs until this criminal trial is concluded. Deferring a case schedule pending the motions to dismiss will therefore have the added benefit of allowing time for the criminal matter to conclude.

Plaintiff made one prior request to adjourn this conference on service-related grounds (ECF #28), which resulted in a rescheduling from January 10, 2025 to February 7, 2025.

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Respectfully submitted,

/s/ Mark Cuccaro

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